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Federal Communications Commission
Office of Secretary

GUAM/CNMI WORKING GROUP

DOCKET FILE COPY ORIGINAL

June 19, 1997

BY MESSENGER

Mr. William F. Caton Acting Secretary Federal Communications Commission Room 222 1919 M Street, N.W. Washington, D.C. 20554

Re: CC Dkt. No. 96-61; Notice of Ex Parte Meeting

Dear Mr. Caton:

As referenced in the <u>ex parte</u> letter filed on June 11, 1997, please find enclosed for filing an original plus three copies of the minutes of the Working Group meeting.

Questions regarding the foregoing should be directed either to local counsel for the Commonwealth of the Northern Mariana Islands, Thomas K. Crowe, Esq., at (202) 973-2890, or Robert F. Kelley, Advisor to the Governor of Guam, at (202) 624-3670.

No. of Copies rec'd______ List ABCDE Mr. William A. Caton June 19, 1997 Page 2

This ex parte notice is being filed in the Office of the Secretary on June 16, 1997, and should be included in the public record.

Respectfully submitted,

Robert F. Kelley, Jr.

Advisor to the

Governor for Telecommunications

Kobert F. helley, Jr. (The)

and Technology

GUAM LIAISON OFFICE

444 North Capitol Street

Suite 532

Washington, D.C. 20001

Dave Ecret

Special Assistant for

Telecommunications and Utilities

OFFICE OF THE GOVERNOR

Dave Ecret (Tac)

Commonwealth of the Northern

Mariana Islands

Caller Box 10007, Capitol Hill

Saipan, MP 96950

cc: All Commissioners

Patrick Donovan, FCC

William Bailey, FCC

Working Group Participants

Enclosure

GUAM/CNMI WORKING GROUP

JUNE 9, 1997 9:00 AM

MINUTES

I. Welcome and Opening Remarks

Opening welcome from Robert Kelley, Advisor to the Governor of Guam, Mr. Kelley assured those present that the discussion of rate integration would be based on the filings in the public record of the carriers serving Guam and the CNMI. He also indicated that the Group would also address a letter of concern by MCI.

Mr. Ecret, Special Assistant for Telecommunications and Utilities to the Governor of the CNMI, asked that members present introduce themselves.

II. Introduce Representatives and New Attendees:

Tom Crowe CNMI Governor's Office Washington Legal Counsel Dave Ecret CNMI Governor's Office Special Assistant/Co-Chair

Robert Kelley Advisor, Guam Governor's Office/Co-Chair

Jim Stoke AT&T

Herb Marks State of Hawaii Washington Legal Counsel

Veronica Ahern GTA Washington Legal Counsel

Evie Wolfson MCI William Bailey FCC Patrick Donovan FCC

Helen Hall GTE Long Distance

Gordon Maxson GTE/MTC Kent Nakamura Sprint Danny Santos Sprint

Eric Fishman PCI Washington Legal Counsel

Susan Yakutis American Samoa, Legislative Assistant, Congressman

Eni Faleomavaega

Janice Lipsen Governor's Office, American Samoa

III. Administrative Announcements

Mr. Maxson requested that today's meeting adjourn around noon as he has a filing with the FCC today and needs the afternoon for his filing.

IV. NANP Entry

Mr. Kelley asked the carriers how they would handle transit traffic; KP digit as international or U.S. point. AT&T both directions handled as international; however some question exists on permissive dialing. MCI added that they were not the ones who would know. Sprint has no permissive dialing into Guam.

All carriers, except GTE/MTC announced that there would be no permissive dialing period. Callers using 011 after July 1, 1997 would receive a recorded message advising them of the change to 1+. Mr. Ecret asked if GTE/MTC would be able to change and be consistent with the other carriers and not offer permissive dialing. Mr. Ecret asked for a quick response as the CNMI had advised residents there would be a permissive dialing period and there was a short time period to educate people on the change. Mr. Maxson agreed and said he would get back with that question after consulting with MTC on Saipan. Sprint only has prepaid card product out of Saipan and will use their domestic platform. IT&E did not know and would get back. PCI would get back to the group. GTE will get back to the group tomorrow morning.

It was agreed by all in attendance that NANP entry was progressing on a timely basis and would be fully implemented on July 1, 1997. Guam did note that they have some problems in their Feature Group D implementation, although, needed equipment had arrived and would be installed in time for a smooth cutter.

• 880 Interim Calling

Guam/CNMI 800 and 881 on track for July with 877 later in the year brought up to INC meeting last week by Mr. Kelley and asked if there was any problem with the carriers. GTE confirmed there would be true 800 service in the CNMI platform for July 1st. GTA will be several months late in implementing 900 service in Guam. Mr. Kelley asked if this acceptable to the group. Sprint asked how hard is GTA being pushed. Ms. Ahern said they are working hard on the project. Mr. Kelley noted that he has high hope that all issues are resolved by the July 1 date. Sprint: "Is GTA prepared to process 1-800?" Ms. Ahern will find out and get back to the group tomorrow. AT&T is operating under the principles that all will be operational but had not been questioned about IT&E. Ms. Toby said that she will get back tomorrow on the status of IT&E on 800 numbers. Mr. Kelley asked if 800 number dealing with IT&E and AT&T moving forward. Both AT&T and IT&E indicated they were ready. Records are being updated. Sprint and MCI agreed.

Mr. Kelley brought up the question of 950 numberings and Ms. Ahern stated she would get back to the group tomorrow. Sprint noted that during a meeting GTA said they will do away with 950 currently being simulated and will go to real 950. No problem in the CNMI for they have been using real 950 for several years now.

V. Carrier Rate Integration Plans Filed June 1, 1997

Rate Issues

"DELETED" AND NOT DISCUSSED

• Rate Structure/Methodologies

"DELETED" AND NOT DISCUSSED

• Integration of Guam/CNMI Traffic

Sprint was asked why they had chosen not to file for CNMI and Guam. Mr. Nakamura: Sprint is taking a very close look at its operation on Guam and it is not totally clear what the future holds for our operations there and for that reason we were fairly conservative in the way that we responded to the FCC request. Notwithstanding that I think we have responded consistently that we can guess, we can average, with some concern over how much we can average and costs matter. When things like access charges, and facility costs are cranked into the rate averaging we have to see what we can do. It is pretty hard when determining access when your cost is 18 cents a minute with facility costs on top of that from Comsat. And yes, probably any amount of averaging that we can do with the rest of the United States. I do not know of any local where the costs are so desperate and this is one of the reasons we mentioned in our letter as why we wanted to bring this matter to this table for discussion at this meeting.

Mr. Kelley brought up the possibility of price support for interstate access charges if this becomes an essential point. Because of the high cost in the CNMI we have two possibilities and this did include some isolated areas of Alaska where they had high cost...18 to 19 cents but because they were members of NECA their cost were taken as part of the NECA pool and spread across the United States. One methodology would be for there to be a consideration in getting the GTE rates to rates reasonably comparable to NECA rates by a high cost support. It appears that either the CNMI Governor's Office or the Guam Governors Office would need to oversee a separation study to insure the pricing was consistent with prices filed. This would leave an audit trail that there are true and just prices. The other issue that may come up is that GTE could request to the FCC they be allowed to become a part of NECA, and we on Guam would file in support of their request. CNMI Governor's Office, Mr. Ecret, stated for the record that they would support such action by GTE. Mr. Kelley added that short of interstate pooling through NECA, getting high cost support it is going to impact GTE's ability, to get low cost service into the CNMI.

Mr. Ecret stated that he felt such filing with the FCC by MTC could be considered as an emergency request and asked FCC their response. Mr. Donovan noted that they would have to look at the request of MTC and evaluate it. Adding that he did not know right now what action would be taken by the FCC. Hawaii representative noted that they are concerned over undermining the current rate methodology.

• "Permissive Dialed" 011 Calls After August 1, 1997

Discussed above under "NANP Entry."

• Integration of COMSAT Traffic

Mr. Ecret turned the discussion to the high cost being charged by Comsat. Noting that he was very concerned over the order dealing with Comsat and felt that Comsat should be included in their requirement to provide domsat service and not international. He also noted that under universal service, Comsat was required to pay their contribution. A lot of the cost for MTC/GTE/IT&E is the high cost of Comsat. Mr. Donovan stated that he felt the issue was outside the scope of universal service, noting that he felt they were not required to provide rate integration as they provide service to carriers and not subscribers. GTE brought up the question that in light of their military tariff shouldn't they also file a Domsat tariff for Guam and the CNMI and have the Commission look at this. Mr. Donovan stated that he did not have a vehicle to look at Comsat at this time.

Ms. Toby asked if anyone had any information on new satellite operations in the Pacific noting that PanAmSat had changed their beam thus providing a weak signal into Guam and the CNMI. All agreed that there was no indication of new providers in the next few years. However, Mr. Kelley noted that there is one Russian operated system that could be used if approved by the FCC.

The question was raised by Mr. Kelley what action was planned for American Samoa after July 1, 1997. Ms. Ahern noted that there had been previous communications from American Samoa that they did not wish to participate in the NANP and rate integration and asked if there had been any change in their stance. Bill Bailey, FCC, noted that after talking with the representatives of American Samoa that there has been a change in their position due to a change in Governors there. Ms. Lipsen noted that there was a letter from the Samoan Governor to the FCC but she was not the Governor's representative but would attempt to get a copy of the letter for the group. All agreed that they plan to treat American Samoa the same as before.

Tom Crowe announced that the CNMI Governor's Office would be filing with the FCC to address the rate integration plans. MCI asked if the FCC received responses from all carriers including resellers. CNMI Governor's Office agreed to provide copies of all filings during tomorrow's meeting. Mr. Donovan agreed that there is a need for the FCC to issue a notice that all carriers serving the CNMI/Guam must rate integrate by August 1st.

VI. Status of Guam/CNMI Fiber Optic Cable

• GTE Guam Business License

Mr. Maxson announced that MTC had received their business license in Guam but mentioned a power problem at the AT&T site at which they have placed their pop in their Marine Drive office of GTE Pacifica.

Mr. Ecret asked about their filing of a tariff and Mr. Maxson stated that there was currently no need for one as they were using the cable as a carrier's carrier or private line cable. Mr. Kelley and Mr. Crowe discussed their positions regarding the operation of the cable. During the discussion Mr. Ecret expressed concern over the high costs charged by MTC. Mr. Maxson responded saying that the rates had been given to all the carriers that requested service. Mr. Ecret added he was happy to see rates come down but they could be a lot better, noting that the rates are highest in the nation. Mr. Ecret noted that GTE Pacific would be back hauling their traffic from Guam to the CNMI using the fiber cable and the CNMI switch. Mr. Maxson stated that he had no other way as they did not have a switch on Guam.

VII. New Business

Dates for implementation.

Mr. Kelley asked when the carriers would rate integrate.

MCI	August 1
AT&T	July 1
IT&E	August 1
MCI	August 1
GTE	August 1
Sprint	July 1
PCI	August 1

Mr. Marks thank the members for the opportunity for the State of Hawaii to be part of the group for this meeting.

VIII. Adjournment (11:45 am)

Adjourned until 9:30 am June 10, 1997.

GUAM/CNMI WORKING GROUP

Day 2 June 10, 1997

Meeting called to order by Mr. Ecret at 9:40 am.

Introduction of those present.

Dave Ecret CNMI Governor's Office, Special Assistant/Co-Chair

Ana Ogumoro Recording Secretary, CNMI Governor's Office

Eric Fishman PCI Washington Legal Counsel

Danny Santos Sprint
Kent Nakamura Sprint
Gordon Maxson GTE/MTC

Patrick Donovan FCC
Evie Wolfson MCI
Randy Slocum MCI
Ronald Ahern GTA
Phung Pham IT&E

Tim Johnson State of Hawaii

Robert Kelley Advisor to Guam Governor/Co-Chair

Tom Crowe CNMI Governor's Office Washington Legal Counsel Susan Yakutis American Samoa, Legislative Assistant, Congressman

Eni Faleomavaega

Janice Lipsen Governor's Office, American Samoa

Adam Turner Representative CNMI Office

Mr. Ecret noted that the letter from the American Samoa Governor's office to the FCC has been passed out along with a letter from the Samoa Office of Telecommunications, attached as Exhibit A. Mr. Kelley handed out the latest NECA tariff figures, attached as Exhibit B. Finally all received the filings on Rate Integration. Mr. Donovan confirmed all the filings they (FCC) had received had been passed out.

GTA was asked about unfinished business from yesterday's meeting. Ms. Ahern noted she had three questions:

Will GTA be ready for 800 numbers by July 1st?

Yes, according to her phone call with Carl Leon Guerrero the processing of 800 numbers by July 1st is pushing forward and testing the platform will get underway on Monday June 16th. He was hopeful it could start earlier then that.

What about 950 dialing?

950 will be available after July 1st. No plan to sunset 950.

How is the Feature Group D testing going?

MCI testing has been done and a letter had been received from MCI reflecting this. IT&E is in progress and TNI, PCI and Sprint are all in progress. Not yet started in testing is Access, GTE and World Exchange. Pushing very hard to get things done by the deadline.

Mr. Santos stated that Sprint has not started official testing with GTA.

Permissive Dialing

MTC/GTE permissive dialing outbound to the CNMI Governor's Office. PCI will allow permissive dialing. There will be no permissive dialing out of Guam.

MTC/GTE Questions

800 calls will be processed with no problem.

900 calls no one knows at this time and had not been discussed by GTE/MTC.

950 they do offer and will continue to offer.

Regarding the issue of NECA membership and a request to the FCC for a waiver they felt it was a good idea in the mid-management arena but would bring the question to higher management level.

Kelley to FCC (Donovan): what time frame for a waiver for NECA entry by GTE out of commission. Mr. Donovan noted that there is a need to take quick action, as the FCC understands time urgency and would do all possible to meet August 1, 1997.

The meeting adjourned at 10:20 am to resume at the call of the co-chairs.

Ana Ogumoro Recording Secretary June 11, 1997

Exhibits

EXHIBIT A



OFFICE OF THE GOVERNOR

American Samoa Government Pago Pago, American Samoa 96799

TAUESE P.F. SUNIA, GOVETTO' TOGICLA T.A. TULAFONO, Telephone: (684) 633-4118 Fex: (684) 633-2289

April 28, 1997

Serial No: 680

Honorable Hundt Chairman Federal Communications Commission Washington, D.C. 20240

Dear Chairman Hundt,

Because of the recent elections in American Samoa, this is the first opportunity that my administration has had to provide comments with respect to the implementation of the Telecommunications Act of 1996.

With respect to the final rule on Universal Service which will be issued on May 8, 1997, it is my understanding that the Joint Board has affirmed the mandate in the Telecommunications Act that mandates that the insular areas receive the same treatment as will the continental states. We are generally pleased at the level of commitment to true universal service which the Joint Board has demonstrated in its recommendations.

At the same time, we would ask that the FCC consider American Samoa's unique circumstances when issuing the upcoming Universal Service ruling. In particular, we would like to call your attention to:

- the need the guarantee access for low income residents of American Samoa in order to ensure that telecommunications services are available to all:
- the need for technical assistance to aid us in the development of local regulations with respect to competition, cost and other issues:
- the need to maintain adequate levels of services in order to ensure that our schools and hospitals meet national standards;
- the importance of recognizing the differing technical environments among the insular areas, and;
- the need to ensure that the technology available to the insular areas keeps pace with the technology available elsewhere in the nation.

We are also concerned with how pricing models for services will evolve, as the language in Section 434 states, "...we recommend that rural carriers serving high-cost insular areas...should continue to receive universal service support based on their embedded costs." It is our hope that sufficient data will be gathered to develop an accurate pricing model for the insular areas, and we look forward to the opportunity to work together on the development of such a model.

While there are similarities in the concerns faced by the insular areas because of our remote locations and relatively small populations, there are also significant differences. For example, Guam and CNMI already have fiber optic cables which provides access to telecommunications services, whereas American Samoa has no such cable at present and must rely on satellite communications. Further, Guam and CNMI will become part of the North American Numbering Plan (NANP) July 1, 1997. American Samoa will then be the only part of the United States where international dialing rates apply. Finally, American Samoa's Office of Communications, a government agency, currently provides telecommunications services to the people of the territory.

We recognize the tremendous challenge faced by the FCC in implementing the Telecommunications Act. We want to extend our appreciation for the commitment you have demonstrated to including the concerns of the insular areas in Universal Service, and we look forward to working with the FCC further to ensure that American Samoa has the same access to quality services at just, reasonable and affordable rates as does the rest of the nation.

Thank you for your consideration of these comments. If I can provide further information, please do not hesitate to contact me.

Kind regards,

TAUÈSE P.F. SUNIA

Governor

kmm



AMERICAN SAMOA GOVERNMENT PAGD PAGD, AMERICAN SAMOA 96799 OFFICE OF COMMUNICATIONS

In reply refer to:

Serial: 136-97

COM: 11 May 6, 1997

The Honorable Reed E. Hundt Chairman Federal Communications Commission 1990 M Street, N.W. Washington, D.C. 20036

Re: Federal-State Borad on

Universal Service CC Docket No. 96-45

Dear Chairman Hundt:

The Governor of American Samoa has asked the Office of Communications to submit comments on the matter of universal service, particularly on the need for schools, libraries and health care providers to have access to advanced telecommunications services as provided in \$254(b) (6) of the new Telecommunications Act. Our office acts as the local telephone exchange in American Samoa and also provides outbound interstate service by agraement with major long-distance carriers. The major carriers provide inbound interstate service.

To satisfy \$254(b) (6), we believe that discounts in charges for both local and interstate service can and should be provided for schools. libraries, and health care facilities in American Samoa in order to facilitate the use of advanced telecommunications services and techniques. With regard to interstate service, we believe that the discounts should apply to both inbound and outbound traffic and that all long-distance carriers serving American Samoa should offer such discounts.

The Office of Communications is prepared to take the lead in offering discounts for schools, libraries, and health care providers, and we are also prepared to work with our major long-distance carriers in arranging a rational and comprehensive package of such discounts. Our preliminary assessment is that the discounts for schools, libraries, and health care providers could range up to 50 percent of the normal charges for local and long-distance service.

Very truly yours,

ALEKI SENE

Director of Communications

cc: Honorable Tauese P.F. Sunia Governor of American Samoa

EXHIBIT B

NECA Interstate Tariff Rates

Quick Reference Chart

As of: July 1, 1996

	1994 Jan 1	1994	1994	1995 July 1	1995	1996 Mar 4	1996 Арг 2	1996 July 1
SWITCHED ACCESS	Jan I	Apr 1	July 1	July !	Aug 1	mar +	Api 2	July 1
Carrier Common Line								
Originating Premium	0.010000	0.010000	0.009700	0.009700	0.008300	0.008300	0.008300	0.008200
Terminating Premium	0.011000	0.011000	0.009700	0.009700	0.008300	0.008300	0.008300	0.008200 0.008200
Blended Rate Originating Non-Premium	0.010500 0.004500	0.010500 0.004500	0.009700 0.004400	0.009700 0.004400	0.008300 0.003700	0.008300 0.003700	0.008300 0.003700	0.003700
Terminating Non-Premium	0.004900	0.004900	0.004400	0.004400	0.003700	0.003700	0.003700	0.003700
•	0.00-000	0.00-000	0.007-100	3.554-155	0.000700	0.000100	0.000700	0.000,00
End Office Charges Premium								
Local Switch	0.041200	0.039200	0.039200	0.040700	0.040700	0.040700	0.040700	0.042200
DA Info Surchg/100	0.026700	0.023200	0.023200	0.016500	0.016500	0.016500	0.016500	0.018400
End Office Charges Non-Premiu	m							
Local Switching	0.018500	0.017600	0.017600	0.018300	0.018300	0.018300	0.018300	0.019000
DA Info Surchg/100	0.012000	0.010400	0.010400	0.007400	0.007400	0.007400	0.007400	0.008300
End User								
Residential/Single Business	3.50	3.50	3.50	3.50	3.50	3.50	3.50	3.50
Multi-line Business	6.00	6.00	6.00	6.00	6.00	6.00	6.00	6.00
000 D-4- D 0								
800 Data Base Query Basic	0.007500	0.007500	0.006600	0.007000	0.007000	0.007000	0.007000	0.005400
Vertical	0.007300	0.007500	0.006900	0.007500	0.007500	0.007500	0.007500	0.005900
"HF" ECs (no LTR, but add EF)								
Local Transport Prem								
Termination	0.014700	0.013600	0.013600	0.014700	0.014700	0.014700	0.014700	0.014600
Facility/mile/AMOU	0.000187	0.000132	0.000132	0.000125	0.000125	0.000125	0.000125	0.000096
Local Transport Non-Prem								
Termination	0.006600	0.006100	0.006100	0,006600	0.006600	0.006600	0.006600	0.006600
Facility/mile/AMOU	0.000084	0.000059	0.000059	0.00056	0.000056	0.000056	0.000056	0.000043
	 							
LTR Rates* AMOU Sensitive		************************						onennantitonentet saata (
RIC								
Premium	0.013179	0.012778	0.012778	0.013640	0.013835	0:013685	0.013685	0.013686
Non-Premium	0.005931	0.005750	O.C.	0.000138	020575	0.000198	0.008136	0.006159
Tandem Switched: Transport								
Termination (per Term)	0.000722	0.000839	0.000539	0.000530	0300530	0.000539	0:000539	0.000466
Facilitymile	0.000155	0.0001616	0.0000118	0.000116	0.000116	0.000116	0.000115	0.000096
Tandem Switching (per A/T)	0.000990	0.000946	0.000946	0.000837	0.000837	0.000937	0.000937	0.000978
LTD Datast Plat Bate I								
LTR Rates* Flat Rated								
Direct Trunked Transport								
Termination (per Term)	***	***	***	607.20	607 20	607.00	£07.30	624.26
Voice Grade Hi Cap DS1	\$26.01 \$156.02	\$25.85 \$116.34	\$25.85	\$27.38 \$116.34	\$27.38 \$116.34	\$27.38 \$116.34	\$27.38 \$116.34	\$24.26 \$101.01
Hi Cap DS3	\$858.11	\$116.34 \$604.97	\$116.34 \$604.97	\$604.97	\$116.34 \$604.97	\$604.97	\$604.97	\$551.52
Facility/mile	4000.11	400-1.57	4004.57	400 -1.01	400 1.01	4004.07	400-1.01	
Voice Grade	\$2.59	\$2.57	\$2.57	\$2.73	\$2.73	\$2.73	\$2.73	\$2.42
Hi Cap DS1	\$33.76	\$25.10	\$25.10	\$25.10	\$25.10	\$25.10	\$25.10	\$19.46
Hi Cap DS3	\$371.35	\$256.03	\$256.03	\$256.03	\$256.03	\$256.03	\$256.03	\$148.86
Entrepo Escilla								
Entrance Facility	8 26.04	P00 40	POC 40	ean ar	620 AF	eso or	ead at	\$3 3.89
VG 2 Wire VG 4 Wire	\$3 6.34 \$5 8.14	\$36 .12 \$5 7.79	\$3 6.12 \$5 7.79	\$38 .25 \$ 61.21	\$38.2 5 \$6 1.21	\$38.25 \$61.21	\$38.25 \$61.21	\$53.69 \$54.23
Hi Cap DS1	\$266.87	\$57.79 \$198.94	\$57.79 \$198.94	\$198.94	\$01.21 \$198.94	\$01.21 \$198.94	\$198.94	\$176.25
Hi Cap DS3	\$2,802.11	\$2,307.75	\$2,307.75	\$2,307.75	\$2,307.75	\$2,307.75	\$2,307.75	\$2,044.57
•	,	· —, · · · =			· · · · · · · · ·			•
Multiplexing	*** **	.	AETA 00	eren no	¢een on	6EEA 00	eren oo	CATA 24
DS3 to DS1	\$711.40 \$212.35	\$550.00 \$212.35	\$550.00 \$212.35	\$550.00 \$212.35	\$550.00 \$ 212.35	\$550.00 \$212.35	\$550.00 \$2 12.35	\$474.3 1 \$183 .12
DS1 to Vaice	\$212.35	\$212.35	φ∠1∠.3 3	9£12.30	4 ∠1∠.33	4€12.33	ψ&12.00	¥100.12

^{*} Prior to January 1, 1994, I need Transport consisted of only two elements

NECA Interstate Tariff Rates

Quick Reference Chart

As of: July 1, 1996

	1994	994 1994	1994	1995	1995	1996	1996	1996
	Jan 1	Apr 1	July 1	July 1	Aug 1	Mar 4	Apr 2	July 1
SWITCHED ACCESS (contin	wed)		,				•	
	***************************************	*************			***************************************	664204444444444444444444444444444444444		200000000000000000000000000000000000000
Non-Recurring Charges Access Order Charge	124.00	124.00	76.00	82.00	82.00	82.00	82.00	82.00
T installation x PIU	220.00	220.00	220.00	220.00	220.00	220.00	220.00	220.00
nstallation per Entrance Facility	220.00	220.00	220.00	22,0,00	220.00	220.00	220.00	220.00
VG 2 Wire	\$227.00	\$227.00	\$205.00	\$171,00	\$171.00	\$171.00	\$171.00	\$171.00
VG 4 Wire	\$227.00 \$227.00	\$227.00 \$227.00	\$205.00	\$171.00	\$171.00	\$171.00	\$171.00	\$171.00
Hi Cap DS1	\$178.00	\$178.00	\$245.00	\$232.00	\$232.00	\$232.00	\$232.00	\$232.00
Hi Cap DS3	\$941.60	\$941.60	\$805.00	\$507.00	\$507.00	\$507.00	\$507.00	\$507.00
runk Activation Charge	45 ///.	40 ////00	***************************************	V	7507.55	4007.00	0007,00	0007.00
Per Order/Per 24 Trunks or Fraction	\$242.00	\$242.00	\$265.00	\$273.00	\$273.00	\$273.00	\$273.00	\$273.00
SPECIAL AGGESS VOICE GR	2de							
hannel Termination			•	***************************************			***************************************	
2 Wire	36.34	36.12	36.12	38,25	38.25	36.65	36.65	33.89
4 Wire	58.14	57.79	57.79	61.21	61.21	58.64	58.64	54.23
hannel Mileage		22	2 .			20.0 .	3	- ··
Facility/mile	2.59	2.57	2.57	2.73	2.73	2.62	2.62	2.42
Termination	26.01	25.85	25.85	27.38	27.38	26.24	26.24	24.26
ridging								
Voice, Data	6.15	6.15	6.15	6.15	6.15	6.15	6.15	6.15
ata Capability	5.30	5.30	5.30	5.30	5.30	5.30	5.30	5.30
cess Order Charge	124.00	124.00	76.00	82.00	82.00	82.00	82.00	82.00
pecial Access Surcharge	25.00	25.00	25.00	25.00	25.00	25.00	25.00	25.00
stallation per Chan Term	227.00	227.00	205.00	171.00	171.00	171.00	171.00	171.00
MERINANIS NEW PROPERTY.								
hannel Termination	67.23	66.83	66.83	70.77	70.77	67.81	67.81	62.70
hannel Mileage Facility/mile		• •						
< or = 19.2 kbps	2.59	2.57	2.57	2.73	2.73	2.62	2.62	2.42
56 or 64 kbps	5.19	5.16	5.16	5.45	5.45	5.22	5.22	4.83
	00	0	••••	50	J. 1.5	V		
• • • • • • • • • • • • • • • • • • •								
Termination < or = 19.2 kbps	26.01	25,85	25.85	27.38	27,38	26.24	26.24	24.26
Termination	26.01 52.02	25.85 51.71	25.85 51.71	27.38 54.76	27.38 54.76	26.24 52.47	26.24 52.47	
Termination < or = 19.2 kbps 56 or 64 kbps ccess Order Charge	52.02 124.00	51.71 124.00	51.71 76.00	54.76 82.00	54.76 82.00	52.47 82.00	52.47 82.00	24.26 48.52 82.00
Termination < or = 19.2 kbps 56 or 64 kbps ccess Order Charge	52.02	51.71	51.71	54.76	54.76	52.47	52.47	48.52
Termination <or> <or> <or> <or> <or> <or> <or> <or></or></or></or></or></or></or></or></or>	52.02 124.00 176.00	51.71 124.00	51.71 76.00	54.76 82.00	54.76 82.00	52.47 82.00	52.47 82.00	48.52 82.00
Termination <pre></pre>	52.02 124.00 176.00	51.71 124.00 176.00	51.71 76.00 216.00	54.76 82.00 221.00	54.76 82.00 221.00	52.47 82.00 221.00	52.47 82.00 221.00	48.52 82.00 221.00
Termination <pre> < or = 19.2 kbps</pre>	52.02 124.00 176.00	51.71 124.00	51.71 76.00	54.76 82.00	54.76 82.00	52.47 82.00	52.47 82.00	48.52 82.00 221.00
Termination <pre><pre><pre><pre><pre><pre><pre><pre></pre></pre></pre></pre></pre></pre></pre></pre>	52.02 124.00 176.00	51.71 124.00 176.00	51.71 76.00 216.00	54.76 82.00 221.00	54.76 82.00 221.00	52.47 82.00 221.00	52.47 82.00 221.00	48.52 82.00 221.00 176.25
Termination <pre> < or = 19.2 kbps</pre>	52.02 124.00 176.00	51.71 124.00 176.00	51.71 76.00 216.00	54.76 82.00 221.00	54.76 82.00 221.00	52.47 82.00 221.00	52.47 82.00 221.00	48.52 82.00
Termination <pre> < or = 19.2 kbps</pre>	52.02 124.00 176.00 266.87 33.76	51.71 124.00 176.00 198.94 25.10	51.71 76.00 216.00 198.94 25.10	54.76 82.00 221.00 198.94 25.10	54.76 82.00 221.00 198.94 25.10	52.47 82.00 221.00 190.61 24.05	52.47 82.00 221.00 190.61 24.05	48.52 82.00 221.00 176.25 19.46 101.01
Termination <pre><pre><pre><pre><pre><pre><pre><pre></pre></pre></pre></pre></pre></pre></pre></pre>	266.87 33.76 156.02 2802.11	51.71 124.00 176.00 198.94 25.10 116.34 2307.75	51.71 76.00 216.00 198.94 25.10 116.34 2307.75	54.76 82.00 221.00 198.94 25.10 116.34 2307.75	54.76 82.00 221.00 198.94 25.10 116.34 2307.75	52.47 82.00 221.00 190.61 24.05 111.47 2211.13	52.47 82.00 221.00 190.61 24.05 111.47 2211.13	48.52 82.00 221.00 176.25 19.46 101.01 2044.57
Termination <pre><pre><pre><pre><pre><pre><pre><pre></pre></pre></pre></pre></pre></pre></pre></pre>	266.87 33.76 156.02 2802.11 371.35	51.71 124.00 176.00 198.94 25.10 116.34 2307.75 256.03	51.71 76.00 216.00 198.94 25.10 116.34 2307.75 256.03	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32	48.52 82.00 221.00 176.25 19.46 101.01 2044.57 148.86
Termination < or = 19.2 kbps 56 or 64 kbps cess Order Charge stallation per Chan Term PETAL ACTUANT DS1 or T1 44 Channel Termination 44 Channel Mileage Facility/mile Termination DS3 736 Channel Termination 736 Channel Mileage Facility/mile Termination Termination Termination Termination Termination Termination Termination Termination Termination	266.87 33.76 156.02 2802.11	51.71 124.00 176.00 198.94 25.10 116.34 2307.75	51.71 76.00 216.00 198.94 25.10 116.34 2307.75	54.76 82.00 221.00 198.94 25.10 116.34 2307.75	54.76 82.00 221.00 198.94 25.10 116.34 2307.75	52.47 82.00 221.00 190.61 24.05 111.47 2211.13	52.47 82.00 221.00 190.61 24.05 111.47 2211.13	48.52 82.00 221.00 176.25 19.46 101.01 2044.57 148.86
Termination <pre></pre>	266.87 33.76 156.02 2802.11 371.35 858.11	51.71 124.00 176.00 198.94 25.10 116.34 2307.75 256.03 604.97	51.71 76.00 216.00 198.94 25.10 116.34 2307.75 256.03 604.97	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64	48.52 82.00 221.00 176.25 19.46 101.01 2044.57 148.86 551.52
Termination <pre><pre><pre><pre><pre><pre><pre><pre></pre></pre></pre></pre></pre></pre></pre></pre>	266.87 33.76 156.02 2802.11 371.35	51.71 124.00 176.00 198.94 25.10 116.34 2307.75 256.03	51.71 76.00 216.00 198.94 25.10 116.34 2307.75 256.03	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32	48.52 82.00 221.00 176.25 19.46 101.01 2044.57 148.86
Termination < or = 19.2 kbps 56 or 64 kbps ccess Order Charge stallation per Chan Term PETAL ACCUSATION DS1 or T1 544 Channel Termination 544 Channel Mileage Facility/mile Termination DS3 .736 Channel Termination .736 Channel Termination .736 Channel Mileage Facility/mile Termination .736 Channel Mileage Facility/mile Termination ultiplexing DS3 to DS1 DS1 to Voice	266.87 33.76 156.02 2802.11 371.35 858.11 711.40 212.35	51.71 124.00 176.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	51.71 76.00 216.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64 527.01 203.47	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64 527.01 203.47	48.52 82.00 221.00 176.25 19.46 101.01 2044.57 148.86 551.52 474.31 183.12
Termination < or = 19.2 kbps 56 or 64 kbps ccess Order Charge stallation per Chan Term PECIAL ACCESS NO. DS1 or T1 544 Channel Termination 544 Channel Mileage Facility/mile Termination DS3 .736 Channel Termination .736 Channel Termination .736 Channel Mileage Facility/mile Termination July/mile Termination ultiplexing DS3 to DS1 DS1 to Voice cess Order Charge	266.87 33.76 156.02 2802.11 371.35 858.11 711.40 212.35	124.00 176.00 198.94 25.10 116.34 2307.75 256.03 604.97	51.71 76.00 216.00 198.94 25.10 116.34 2307.75 256.03 604.97	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64 527.01	48.52 82.00 221.00 176.25 19.46 101.01 2044.57 148.86 551.52 474.31 183.12
Termination <pre><pre><pre><pre><pre><pre><pre><pre></pre></pre></pre></pre></pre></pre></pre></pre>	266.87 33.76 156.02 2802.11 371.35 858.11 711.40 212.35	51.71 124.00 176.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	51.71 76.00 216.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	54.76 82.00 221.00 198.94 25.10 116.34 2307.75 256.03 604.97 550.00 212.35	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64 527.01 203.47	52.47 82.00 221.00 190.61 24.05 111.47 2211.13 245.32 579.64 527.01 203.47	48.52 82.00 221.00 176.25 19.46 101.01 2044.57 148.86 551.52 474.31 183.12

^{*} Prior to January 1, 1994, Local Transport consisted of only two elements.